

# St. Mary's Good Samaritan Incorporated

*Cosponsored by Felician Services Inc  
and SSM Health Care*

April 26, 2004

**CERTIFIED MAIL**

Illinois EPA, Bureau of Air, Compliance Unit (MC 40)  
1021 North Grand Avenue East  
PO Box 19276  
Springfield, IL 62794-9276

Reference: I.D. 081030ACN

**RECEIVED**

APR 28 2004

AIR ENFORCEMENT BRANCH,  
U.S. EPA, REGION 5

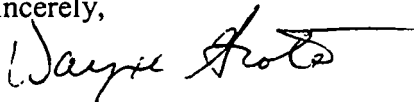
Dear Ms. Armitage:

Enclosed please find a completed Form 401 CAAPP Annual Compliance Certification for calendar year 2003 and a 2004 Waste Management Plan Update, as required by our Permit.

We are sending a duplicate of this report to the IEPA Division of Air Pollution Control, Springfield, IL; IEPA Division of Air, Collinsville, IL; Illinois EPA Bureau of Air, Des Plaines, IL; and USEPA Region 5, Chicago IL. If there are any additional locations within the IEPA or EPA where this report is to be sent, please let me know or forward a copy for us.

If any additional information is required, please contact me at 618-241-2312, and we will be happy to answer any questions or provide any additional information.

Sincerely,



Wayne Grote, V.P. Administrative Services

cc: Leo Childers, President  
Don Kalahar, Director Environmental Services  
Cabot Thunem, PE

605 North 12th Street  
Mt Vernon IL 62864  
618 242 4600

[www.smgsi.com](http://www.smgsi.com)



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF AIR POLLUTION CONTROL  
COMPLIANCE AND SYSTEMS MANAGEMENT SECTION  
1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276  
SPRINGFIELD, ILLINOIS 62794-9276

**RECEIVED**

APR 28 2004

<b>CAAPP ANNUAL COMPLIANCE CERTIFICATION</b>	<b>FOR AGENCY USE ONLY</b>	
	ID NUMBER	<b>AIR ENFORCEMENT BRANCH U.S. EPA, REGION 5</b>
	PERMIT #	
	DATE	

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT EACH CAAPP PERMIT HOLDER SUBMIT AN ANNUAL COMPLIANCE CERTIFICATION FOR ALL EMISSION UNITS AT THE SOURCE AS REQUIRED BY 40 CFR 70.6(c)(5), 39.5(f)(p)(v) OF THE ENVIRONMENTAL PROTECTION ACT AND CAAPP PERMIT CONDITION 9.8. THE COMPLIANCE CERTIFICATION REPORTING PERIOD IS JANUARY 1 TO DECEMBER 31 AND IS DUE ON OR BEFORE MAY 1 FOR THE PRECEDING CALENDAR YEAR. THIS CERTIFICATION FORM CAN BE USED BY FACILITIES TO SATISFY THIS REQUIREMENT.

**SOURCE INFORMATION**

1) SOURCE NAME Good Samaritan Regional Health Center			
2) SOURCE ADDRESS 605 North 12 <sup>th</sup> Street			
3) CITY Mt. Vernon		4) COUNTY Jefferson	
5) TOWNSHIP Mt. Vernon	6) STATE Illinois	7) ZIP CODE 62864	
8) DATE FORM PREPARED April 9, 2004		9) SOURCE ID NO 081030ACN	
10) CAAPP PERMIT NO 081030ACN			
11) CALENDAR YEAR OR REPORTING PERIOD COVERED BY THIS REPORT 2003			

**SOURCE COMPLIANCE INFORMATION**

12) CHECK EITHER (a) OR (b) BELOW
(a) <input type="checkbox"/> During the entire reporting period, this source was in <b>continuous</b> compliance with ALL terms and conditions contained in its CAAPP permit. The method used to determine compliance for each term and condition is the method specified in the permit.
<b>NOTE: If (a) is selected, completion of Table 1 is optional. Table 2 does not need to be completed.</b>
(b) <input type="checkbox"/> With the exception of the items identified in Table 1 and Table 2, this source was in <b>continuous</b> compliance with all terms and conditions contained in the permit. The method used to determine compliance for each term and condition is the method specified in the permit, unless otherwise indicated.
<b>NOTE: If (b) is selected, complete Tables 1 and 2 for those units and/or activities that are in intermittent or noncompliance status.</b>

**ATTACHMENTS**13) Are you submitting any attachments with this report? Yes ☒ No ☐

If yes, please list the attachments below:

~~The format requested by the IEPA for Tables 1 and 2 resulted in a more voluminous report than could be inserted in the Forms containing Tables 1 and 2. The attachments contain the information requested in Tables 1 and 2.~~

**COMPLIANCE CERTIFICATION REPORT MAILING**

14) In addition to submitting the Compliance Certification report to the Compliance and Systems Management Section (CASM), a copy of the Compliance Certification report must also be submitted to the USEPA Region 5 and the appropriate IEPA regional field office. Addresses are listed in condition 8.6 of your CAAPP permit.

Please check the appropriate boxes.

A copy of the Compliance Certification report has been submitted to USEPA

Yes ☒ No ☐

A copy of the Compliance Certification report has been submitted to the appropriate IEPA regional field office.

Yes ☒ No ☐**SOURCE CONTACT PERSON**15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT  
Don Kalahar16) TECHNICAL CONTACT PERSON TITLE  
Environmental Services Director17) CONTACT PERSON'S TELEPHONE NUMBER  
618/241-2336**COMPLIANCE STATEMENT AND SIGNATURE BLOCK**

NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS INCOMPLETE.

18) I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

AUTHORIZED SIGNATURE

BY



AUTHORIZED SIGNATURE

Leo F. Childers, Jr.

TYPED OR PRINTED NAME OF SIGNATORY

President

TITLE OF SIGNATORY

04 / 26 / 2004

DATE

[illegible]

### Table 2. Deviation Summary Report

[illegible]

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Permit Condition Reference Number	Description Of Permit Condition	Compliance Status	Compliance Determination Method
1.1	Source	C	The source is as described.
1.2	Owner/Parent Company	C	The owner is as shown
1.3	Operator	C	The operator is as described.
1.4	General Source Description	N	The source is as described with the exception that the permit lists the incinerator as both batch and as continuous duty.
2.0	List of Abbreviations/Acronyms used in this permit	C	The condition contains only abbreviations and acronyms.
3.1.1	Activities determined by the IPEA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:	C	There are no insignificant activities listed.
3.1.2	Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:	C	There are not activities listed
3.1.3	Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows: a) Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons provided the tank is not used for the storage of gasoline or any listed hazardous air pollutant pursuant to Section 112(b) of the Clean Air Act (35 IAC 201.210(a)(10)). b) Gas turbines and stationary reciprocating internal combustion engines of between 112 kW (150	C	Insignificant activities at the source fall within these definitions.

	horsepower) power output (35 IAC 201.210(a)(15)). c) Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units (35 IAC 201.210(a)(16)).		
3.1.4	Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).	C	Insignificant activities fall within this definition.
3.2.1	Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. IN particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable: For each cold cleaning degrease, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.	C	The Permittee has no cold cleaning degreasers.
3.2.2	Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. IN particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable: For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.	C	Process units in this category comply with this standard.
3.2.3	Insignificant activities are subject to	C	There are no mixers

	applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable: For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301 or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.		or printing lines at the source.
3.3.1	The Permittee is no required to notify the IEPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201,212(a).	C	The renewal application for the permit has not been submitted.
3.3.2	The Permittee must notify the IEPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.	C	No new qualifying insignificant activities were proposed.
3.3.3	The Permittee is not required to notify the IEPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).	C	The Permittee has not notified the IEPA of any such defined additions.
4.0	Significant Emission Units at this Source	I	The significant emission units at the source are as shown with one exception. Unit 1, the HMIWI now has an emission control unit installed.
5.1.1	This permit is issued based on the	C	The installed system



	operation of the Hospital/Medical/Infectious Waste Incinerator at this source which requires a CAAPP permit pursuant to 35 IAC 229.120(b).		has a CAAPP and the installed unit is a HMI.
5.1.2	This permit is issued based on the source not being a major source of HAPs.	C	The source is not a major source of HAPs
5.2.1	Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.	C	The emissions units listed in Section 7 are the emission units installed at the Source.
5.2.2.a	No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314. Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.	C	No fugitive emissions in excess of those specified in this condition were emitted from the Source.
5.2.2.b	No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.	C	No opacity in excess of that specified in this condition were emitted from the source.
5.2.3	The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82.	C	The Permittee complies with the specified rules.
5.2.3.a	Persons opening appliances for maintenance, service, repair, or	C	The source complied with this rule

	disposal must comply with the required practices pursuant to 40 CFR 82.156.		
5.2.3.b	Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.	C	The equipment used complies with this rule.
5.2.3.c	Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.	C	Persons performing the specified maintenance are certified as required.
5.2.4	Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:	C	The stationary source did not become subject to the specified rules so no submittals were required.
5.2.4.a	A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or	C	The stationary source is not subject to this rule so not compliance schedule was required
5.2.4.b	A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.	C	The source is not subject to this rule so no certification statement was required.
5.2.5.a	Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR	C	The source did not become subject to this rule so no compliance actions were required.

	Part 70 or 71		
5.2.5.b	No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.	C	The permit is not due for renewal so no filing is required.
5.2.6.a	If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.	C	The source is not required to have an episode action plan.
5.2.6.b	The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.	C	The source is not required to have an episode action plan so there are no steps in an alert or emergency.
5.2.6.c	If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.	C	No changes have occurred and no plan is required.
5.2.6.d	For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to	C	The source is not required to have a plan.
5.3	Non-Applicability of Regulations of Concern	C	Since there are no conditions in this section there is nothing to comply with.

5.4	In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:	C	There are no conditions listed in this section.
5.5.1	The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable	C	The source did not exceed the emissions listed in this section based on calculated operation.
5.5.2	This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.	C	HAP emissions did not exceed the maximum based on calculated operation.
5.5.3	Other Source-Wide Emission Limitations	C	There are no other limits.
5.6.1	Emission Records The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act: Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.	C	Emission records are kept as required.
5.6.2.a	Retention and Availability of Records All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the	C	All records and logs are retained as required.

			purpose.
7.1.2	List of Emission Units and Air Pollution Control Equipment "Batch HMIWI with maximum waste charging rate 310 lb/hr	N	The installed and permitted unit is a continuous unit. Therefore the source is not in compliance with this section.
7.1.3.a	The "affected medium hospital medical infectious waste incinerator" for the purpose of these unit-specific conditions, is an emission unit for incineration of the medical waste generated by the hospital operations and not exceeding 310 lb/hr of the charging waste.	C	The installed unit is as described and used as specified.
7.1.3.b	The affected medium HMIWI is subject to the emission limits established in 35 IAC Part 229 "Hospital/Medical/Infectious Waste Incinerators" and shall fully comply with 35 IAC Part 229 by September 15, 2002 pursuant to 35 IAC 229.115(b), and Compliance Schedule established in Condition 7.1.10. The Permittee shall be in full compliance with all of the HMIWI operator provisions of 35 IAC Part 229, Subpart J by September 15, 2000. All emission limits and requirements are discussed further in this Section.	I	The source is not continuously in compliance because the source test did not take place as required by the schedule. The IEPA was informed at the time and agreed with the schedule change. The IEPA also stated that there was probably no need to revise the permit..
7.1.3.c.i	No person shall cause or allow the emission of particulate matter into the atmosphere from incinerators for which construction or modification commenced on or after April 14, 1972, to exceed 229 mg/scm (0.1 gr/scf) of effluent gases corrected to 12 percent carbon dioxide [35 IAC 212.181(d)].	C	The unit was tested after initial installation and demonstrated compliance with this requirement.
7.1.3.c.ii	No person shall cause or allow the emission of carbon monoxide into the atmosphere from any incinerator to exceed 500 ppm, corrected to 50 percent excess air [35 IAC 216.141].	C	The unit was tested after initial installation and demonstrated compliance with this requirement
7.1.4.a	The affected medium HMIWI is exempted from compliance with 35 IAC Part 229 by September	C	The HMIWI operators were

	source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.		
5.6.2.b	The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.	C	The Permittee will retrieve and print the records as specified.
5.7.1	The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.	I	The Permittee has reported problems as required except in cases where the Permittee was not aware of the problem.
5.7.2	Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit	C	The source has the records, reported, and followed the compliance procedures as outlined.
5.8	General Operational Flexibility/Anticipated Operating Scenarios	C	This conditions is not applicable
5.9.1	Compliance with the source-wide emission limits specified in Conditions 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7 and compliance procedures in Section 7 (Unit Specific conditions) of this permit.	C	Since the source is in compliance with Conditions 5.5, 5.6, and 5.7 and the procedures in Section 7 it is in compliance with this condition.
6.0	Not applicable to this permit	C	There are no conditions in this section
7.1.1	A continuous HMIWI is used for disposal (incineration) of hospital operations	C	The unit is as described and used for the stated

	35 IAC Part 229 by September 15, 2000, except for operator provisions, pursuant to 35 IAC 229.115(b).		trained and the unit is exempt from the September 15, 2000 compliance.
7.1.4.b	The affected medium HMIWI is not subject to 40 CFR 60.50c because construction of this HMIWI was commenced prior to June 20, 1996.	C	The HMIWI is not subject to this provision.
7.1.5.a	Only general hospital waste, including medical/infectious waste and pathological waste, shall be charged to the incinerator at the rate not exceeding 310 lb/hr, based on measurement of the weight of each load or "charge" of waste introduced into the incinerator.	C	Only general hospital waste was charged at a rate not exceeding 310 lb/hr until the initial compliance test.
7.1.5.b	The secondary combustion chamber of affected HMIWI shall be preheated to minimum 1400 F prior to introducing waste into the incinerator. This temperature shall be maintained until burnout of waste in the primary chamber is completed.	C	Compliance was determined by examination of the operating record
7.1.6.a	No HMIWI shall be operated unless a trained and qualified HMIWI operator, as specified in 35 IAC Part 229, is available on-site to operate or supervise the operation of the HMIWI.	C	Operators are trained and available as required.
7.1.6.b	To become a trained and qualified operator, a person shall complete a training program that, at a minimum, meets the criteria specified further in this condition, pass the examination administered in accordance with condition described below and have either 6 months experience as an HMIWI operator or have completed 2 burn cycles under the observation of 2 trained and qualified HMIWI operators.	C	The operators were trained in accordance with this standard.
7.1.6.c.i	An operator training program shall satisfy all of the following criteria: Consist of at least 24 hours of training covering the following subjects: 1)Work safety procedures; 2)Pre-startup procedures; 3)Environmental	C	Training consisted of the required items.

	<p>concerns, including pathogen destruction and types of emissions; 4) Basic combustion principles, including combustion byproducts; 5) Instruction in the proper operation of the same type of incinerator that will be used by the operator, including proper startup, waste charging, and shutdown procedures; 6) Combustion controls and monitoring; 7) Operation of air pollution control equipment and factors affecting performance; 8) Methods for monitoring pollutants, both by CEMS and by monitoring of HMIWI and air pollution control device operating parameters, and monitoring instrument calibration procedures; 9) Inspection and maintenance of an HMIWI, air pollution control equipment, and CEMS; 10) Corrective measures to remedy malfunctions and conditions that may lead to malfunction; 11) Characteristics of and proper handling procedures for bottom and fly ash; 12) Recordkeeping procedures; and Applicable Federal, State, and local regulations.</p>		
7.1.6.c.ii	Administer an examination designed by the course instructor;	C	An exam was administered.
7.1.6.c.iii	Provide reference materials covering all of the course topics specified above.	C	Reference materials are provided.
7.1.6.d	Operator qualification is valid from the date on which the examination specified in Condition 7.1.6(c)(ii) is passed, or the completion of the experience requirements set forth in Condition 7.1.6(b), whichever is later.	C	Operator qualification is determined as set forth in this standard.
7.1.6.e.i	In order for an operator that has been qualified in accordance with Condition 7.1.6(b) to maintain the necessary qualification status, the operator shall: Complete and pass an annual review	C	The operators comply with this requirement since the training is in accordance with this requirement.



	course of at least 4 hours in length that, at a minimum, covers the following subjects: A)An update of applicable regulations; B)Proper incinerator operation, including startup and shutdown procedures; C)Proper incinerator inspection and maintenance; D)Responses to malfunctions and conditions that may lead to malfunction; and E)A discussion of operating problems encountered by attendees.		
7.1.6.e.ii	If an operator fails to either take or to complete and pass the annual review course, the operator's qualification will lapse.	C	All assigned operators completed annual review
7.1.6.e.iii	If the operator's qualification lapses for less than 3 years, qualification may be reinstated by taking and passing the annual review course, as provided under Condition 7.1.6(e) (1).	C	No operator had a lapse of longer than three years prior to recertification.
7.1.6.e.iv	If there is a 3 year or greater lapse in an operator's qualification, then the operator shall take and pass an operator training course, as provided for under Condition 7.1.6(c), in order to reinstate the qualification [35 IAC 229.170].	C	No operator had a lapse of longer than three years prior to recertification.
7.1.7.a	Waste Management Plan Requirements The owner or operator of a hospital subject to the requirements in this Part shall submit to the Illinois EPA, in accordance with 35 IAC 229.184(b), a waste management plan. Such plan shall outline technically and economically feasible policies and practices for reducing the amount and toxicity of hospital and medical/infectious waste incinerated at the hospital. The waste management plan shall include the following components: a)The name and location of the facility; b)A written policy statement	C	A waste management plan was prepared based on this format and submitted as required.

	<p>setting forth management support for waste management and implementation of the plan;</p> <p>c) A statement of goals for reducing the volume and toxicity of waste, expressed numerically where feasible;</p> <p>d) Identification of the staff responsible for development and implementation of the plan, as well as a description of their roles and responsibilities;</p> <p>e) A description of communication and education programs to make employees aware of the waste management program and their responsibilities;</p> <p>f) A summary of existing waste management policies and practices;</p> <p>g) Identification of technically and economically feasible waste management policies and practices to be implemented and, where practical, a schedule for the implementation of the selected measures; and</p> <p>Procedures for tracking implementation of the plan and progress toward achieving the goals.</p>		
7.1.7.b	<p>Prior to the development of the waste management plan, the hospital shall assess:</p> <p>a) Current waste management practices;</p> <p>b) All of the available data that it has collected on the types, quantities, and sources of its waste;</p> <p>c) Technical information on alternative waste management practices, such as the American Hospital Association publication entitled "An Ounce of Prevention: Waste Management Strategies for Health Care Facilities," incorporated by reference at 35 IAC 229.104(a); and</p> <p>d) The feasibility of implementing additional waste management policies and practices, taking into account such considerations as:</p> <ol style="list-style-type: none"> <li>1. The effectiveness of existing policies and practices;</li> <li>2. The costs of additional measures;</li> <li>3. The potential effects on patient care and worker safety;</li> </ol>	C	The Permittee performed these assessments prior to the development of the Waste Management Plan.

	4.The environmental benefits and savings; 5.The recycling options available in the area; and 6.The availability of products or equipment needed to implement alternative measures.		
7.1.7.c	The following measures, at a minimum, shall be considered when evaluating alternative waste management practices and developing waste management policies and procedures: a)Segregating waste streams; b)Phasing out the use of products containing toxic materials; c)reusing products and equipment; d)Reducing the use of packaging and disposable items; e)Collecting recyclable materials; and f)Improving inventory control, training and housekeeping practices.	C	The listed measures were all considered in development of the Waste Management Plan.
7.1.7.d	Any waste management plan that has been developed by a hospital subject to the requirements of this part prior to May 15, 1999, may be incorporated into the waste management plan required by this condition, to the extent that such a plan is consistent with the requirements of this condition and 35 IAC 229.176.	C	Previous waste management plan information was incorporated as appropriate.
7.1.7.e	The owner or operator of the affected hospital shall submit a waste management plan to the Illinois EPA at the same time site-specific operating parameters are reported, as specified in 35 IAC 229.184(b).	C	A Waste Management Plan was submitted with report on site-specific operating parameters.
7.1.7.f	The waste management plan shall be updated every 5 years to coincide with the renewal of the facility's CAAPP permit.	C	The CAAPP is not yet due for renewal.
7.1.7.g	The owner or operator of the affected hospital shall submit a waste management progress report to the Illinois EPA annually, along with the annual emissions report required by 35 IAC 201.302. The progress report shall include the	C	A progress report was submitted with the annual compliance test report.

	following elements: a)A description of progress made during the previous calendar year toward meeting the goals established in the plan; b)A summary of the waste management practices that were implemented; and c)Any amendments to the plan along with a brief explanation of the need for the amendments.		
7.1.7.h	Upon written request, the Permittee shall make the waste management plan and annual progress reports available for public review during normal business hours (35 IAC 229.176).	C	The hospital will make the plan and annual reports available upon written request.
7.1.8.a	In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected large HMIWI is subject to the following: After September 15, 2002 the emission shall not exceed the following limits pursuant to 35 IAC 229.125(b),	I	The facility conducted a compliance test. The test report showed the HMIWI was in compliance. Later review by the USEPA resulted in a determination that dioxin emissions had been misreported and the unit did not show compliance for dioxin emissions. Also the unit is a medium HMIWI, not a large HMIWI.
7.1.8.b	Prior to September 15, 2002 emissions of CO and PM from the affected medium HMIWI shall not exceed the limits identified in condition 7.1.3.c.	C	Testing conducted prior to September 15, 2002 demonstrated compliance with this standard.
7.1.8.c	Emissions from the affected HMIWI for the HCl emissions shall not exceed the following limits: These limits are based on the maximum operating rate established as potential emission for the affected HMIWI.	C	Testing conducted prior to September 15, 2002 demonstrated compliance with this standard.

7.1.8.d	Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).	C	The monthly data is available and demonstrates compliance.
7.1.9.a	Initial performance testing of the affected large HMIWI shall be performed no later than the date established in the Compliance Schedule of Condition 7.1.10 and by using the following USEPA test Methods, as established by 35 IAC 229.104(d): USEPA Methods: 1, 2, 3, 3a, 5, 9, 10, 10B, 23, 26, 26A, and 29.	N	The compliance test was not performed prior to the scheduled date. Also the unit is a medium HMIWI, not a large HMIWI
7.1.9.b	When conducting a performance test for an HMIWI, the owner or operator shall: a) Test an HMIWI at the waste charging rate specified in its permit or, if no permit has been issued, in its permit application; b) Burn representative waste streams that are typically combusted in that HMIWI; c) Conduct testing during periods that are inclusive of maximum emissions of the HMIWI and not during periods of startup, malfunction, or shutdown; and d) Weigh the amount of waste combusted for each run of the performance test before charging the waste to an HMIWI to within 1.0 percent accuracy.	C	The performance test was conducted according to this requirement.
7.1.9.c	The owner or operator of an HMIWI shall submit a test plan to the Illinois EPA at least 45 days before conducting a performance test. Performance test plans shall include the following; a) The proposed date of the performance test; b) A roster of testing personnel, which provides information concerning their testing experience; c) A description of the specific conditions under which the test will be performed, including, at a minimum: 1. Why these conditions will be representative of the operation	C	The owner complied with the notification and other requirements.

	and include maximum emissions of the HMIWI; and 2.The means by which the operating parameter values will be determined; d)A technical description of the HMIWI being tested; e)The parameters and pollutants that will be monitored during the performance test; and f)The quality assurance procedures that will be followed during the performance test.		
7.1.9.d	The owner or operator of an HMIWI shall give the Illinois EPA 5 days written notice prior to actually conducting any performance testing required by the provisions of 35 IAC part 229.	C	The owner provided the required notification.
7.1.9.e	Testing conducted pursuant to 35 IAC Part 229 shall be according to the procedures and test methods specified for the measurement of each pollutant in Appendix C of 35 IAC Part 229.	C	Testing followed the listed procedures
7.1.9.f	Any use of a bypass stack during a performance test shall invalidate the results of that run.	C	There was no use of the bypass stack during the test.
7.1.9.g	The owner or operator of an HMIWI may conduct a repeat performance test at any time to establish new site specific operating values for the HMIWI. Such new site specific operating parameter values may not be relied upon until approved by the Illinois EPA as a permit condition.	C	No new test was run during the reporting period.
7.1.9.h	The Illinois EPA or the USEPA may request that the owner or operator of an HMIWI conduct a new performance test at any time.	C	No test was requested by the IEPA
7.1.9.i	Following the date on which the initial performance test is completed, as required by this permit and 35 IAC 229.142, the Permittee shall conduct an annual performance test, by September 15 of each year to determine compliance with the PM, CO and HCl emission limits	C	The Permittee complied with this requirement by conducting a performance test in 2002.

	<p>specified in 35 IAC 229.125(b), using the applicable test procedures and methods specified in 35 IAC 229.140.</p> <p>a) If all 3 annual performance tests over a 3-year period indicate compliance with the emission limits for PM, CO, or HCl specified in 35 IAC 229.125(b), the owner or operator of an HMIWI may forego a performance test for that pollutant during the next 2 years. If the next performance test conducted every third year indicates compliance with the emission limits for PM, CO, or HCl specified in 35 IAC 229.125(b), the owner or operator of an HMIWI may forego a performance test for that pollutant for an additional 2 years from the date of the previous performance test. B) If any performance test indicates noncompliance with the respective emission limit, the owner or operator of an HMIWI shall conduct a performance test for that pollutant annually until all annual performance tests over a 3-year period indicate compliance with the respective emission limits.</p>		
7.1.9.j.i	<p>The Permittee shall comply with the following initial performance testing and establishment of operating parameters requirements, pursuant to 35 IAC 229.142:</p> <p>If an HMIWI is equipped with a dry scrubber followed by a fabric filter, a wet scrubber, or a dry scrubber followed by a fabric filter and wet scrubber, establish the appropriate maximum and minimum operating parameter values indicated in Appendix B of 35 IAC Part 229 and Condition 7.1.9(1) of this permit for the relevant control system during the initial performance test, provided that the performance test demonstrates compliance with the emission limits specified</p>	C	<p>The initial compliance test was conducted on a dry scrubber followed by a fabric filter and operating parameters were established.</p>

	in 35 IAC 229.125; and		
7.1.9.j.ii	If air pollution control equipment other than a dry scrubber followed by a fabric filter, a wet scrubber, or dry scrubber followed by a fabric filter and a wet scrubber is used to comply with the emission limits under 35 IAC 229.125, the initial performance test may not be conducted until site-specific operating parameters that will be monitored to demonstrate compliance with this part have been established by the Illinois EPA in a construction permit and approved by USEPA.	C	The source is in compliance because no other air pollution control equipment was installed.
7.1.9.k	Operating Parameters to be Monitored and Minimum Measurement and Recording Frequencies. A)Maximum Charge Rate, Continuous, once per hour B)Maximum Fabric Filter Inlet Temperature, Continuous, once per minute C)Maximum Flue Gas Temperature, Continuous, once per minute D)Minimum Secondary Chamber Temperature, Continuous, once per minute E)Minimum dioxin/Furan Sorbent Flow Rate, Hourly, once per hour F)Minimum HCl Sorbent Flow Rate, Hourly, once per hour G)Minimum Hg Sorbent Flow Rate, Hourly, Once per hour	C	The system operating parameters are monitored and recorded at the required frequencies.
7.1.10.a	Compliance Plan/Schedule of Compliance To meet full compliance with 35 IAC Part 229 by September 15, 2002 the Permittee shall fulfill the following actions: Complete the installation or construction of the new air pollution control equipment by February 15, 2002; Perform initial startup of the retrofitted HMIWI by March 15, 2002; and Complete the initial performance test by June 1, 2002.	C	The system was installed on schedule.
7.1.10.b	Compliance Plan/Schedule of Compliance To meet full compliance with 35 IAC Part 229 by September 15, 2002 the	C	Initial startup was completed on schedule.



	<p>Permittee shall fulfill the following actions: Perform initial startup of the retrofitted HMIWI by March 15, 2002; and</p> <p>Complete the initial performance test by June 1, 2002.</p>		
7.1.10.c	<p>Compliance Plan/Schedule of Compliance To meet full compliance with 35 IAC Part 229 by September 15, 2002 the Permittee shall fulfill the following actions: Complete the initial performance test by June 1, 2002.</p>	N	<p>The initial performance test was scheduled prior to June 1, 2002 but not completed. This was discussed with the IEPA at the time and with the concurrence of the IEPA the schedule was not modified.</p>
7.1.11.a	<p>Once the initial performance test required by this permit and 35 IAC 229.142 has been performed, and the site-specific minimum and maximum operating parameter values have been established, the owner or operator of the affected large HMIWI shall continuously monitor those parameters.</p>	N	<p>The unit is a medium HMIWI, not a large HMIWI.</p>
7.1.11.b	<p>The owner or operator of the affected large HMIWI shall comply with the following monitoring requirements:</p> <p>a) Install, calibrate according to manufacturer's specifications, maintain, and operate devices or establish methods for monitoring the applicable maximum and minimum operating parameters specified in condition 7.1.9(1) and Appendix B of 35 IAC Part 229 such that these devices or methods measure and record values for these operating parameters at the frequencies indicated in condition 7.1.9(1) of this permit at all times, except during periods of startup and shutdown;</p> <p>b) Install, calibrate according to manufacturer's specifications, maintain, and operate a device or establish a</p>	N	<p>The unit is a medium HMIWI, not a large HMIWI.</p>

	<p>method for identifying the use of the bypass stack, including date, time, and duration of use, c) If control equipment other than a dry scrubber followed by a fabric filter, a wet scrubber, or a dry scrubber followed by a fabric filter and a wet scrubber is used to comply with the emission limits under condition 7.1.6(a), install, calibrate according to manufacturer's specifications, maintain, and operate the equipment necessary to monitor the site-specific operating parameters developed and approved pursuant to 35 IAC 229.142(d); and d) Record monitoring data at all times during HMIWI operation, except during the periods of monitoring equipment malfunction, calibration, or repair. At a minimum, valid monitoring data shall be recorded for 75 percent of the operating hours per day and for 90 percent of the operating days per calendar quarter that an HMIWI is combusting hospital waste or medical/infectious waste (35 IAC 229.166).</p>		
7.1.12.a	<p>The owner or operator of an HMIWI subject to the emission limits under 35 IAC Part 229 shall maintain records of the following information: a) The calendar date of each record b) The following data, where applicable: 1. Concentrations of all applicable pollutants listed in 35 IAC 229.125(b) and any measurements of opacity as required under 35 IAC 229.125(c); 2. HMIWI charge dates, times and weights, and hourly charge rates; 3. If a fabric filter is used, the fabric filter inlet temperatures during each minute of operation; 4. The amount and type of dioxin/furan sorbent used during each hour of operation; 5. The amount and type of Hg sorbent used during</p>	C	<p>The data required and records specified were maintained in accordance with this condition.</p>

	<p>each hour of operation; 6.The amount and type of HCl sorbent used during each hour of operation; 7.The secondary chamber temperatures recorded during each minute of operation; 8.Identification of any use of the bypass stack, including dates, times, and the duration of such use. C) Identification of any calendar days for which data on emission rates or operating parameters specified under Condition 7.1.11(a)(ii) have not been obtained, with an identification of the emission rates or operating parameters not measured, reasons for not obtaining data, and a description of the corrective actions taken; d) Identification of any malfunctions, including the calendar date, the time and duration, and a description of the malfunction and of the corrective action taken to remedy it; e) Identification of calendar days for which data on emission rates or operating parameters specified under Condition 7.1.11(a)(ii) exceeded the applicable limits, with a description of the exceedences, reasons for such exceedences, and a description of the corrective actions taken; f) The results of the initial, annual, and any other performance tests; g) Records of calibration of any monitoring devices as required under Condition 7.1.10(b)' and h) Identification of the names of all HMIWI operators who have met the criteria for qualification under 35 IAC 229.170, including:</p> <ol style="list-style-type: none"> <li>1.Documentation of training and the dates of the training; and</li> <li>2.The date of the initial review and all subsequent annual reviews of the information specified in 35 IAC 229.172(a), as required by 35 IAC 229.172(b).</li> </ol>		
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7.1.12.b	All records required under 35 IAC Part 229 shall be maintained on site for a period of 5 years, in either paper copy or electronic format, unless an alternative format has been approved by the Illinois EPA.	C	The records are maintained for at least 5 years in electronic format.
7.1.12.c	All records required to be maintained pursuant to 35 IAC Part 229 shall be made available to the Illinois EPA upon request.	C	The records are available upon IEPA request.
7.1.13	The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected HMIWI with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken;	C	The Permittee promptly notified the IEPA of noncompliance as soon as the Permittee became aware of such noncompliance.
7.1.13.a	The facility manager and the responsible official for the affected source shall certify each report required under 35 IAC Part 229.	C	Each report has been certified by a responsible official.
7.1.13.b	The owner or operator of an HMIWI shall submit to the Illinois EPA the results of any performance test conducted on the HMIWI within 60 days after conducting the performance test. The information submitted with the initial performance test required by this permit shall include: a) The test data and values for the site-specific operating parameters established for an HMIWI pursuant to 35 IAC 229.142; and b) A copy of the waste management plan required under 35 IAC Part 229, Subpart K.	C	Performance test reports were promptly submitted as received from the testing company.
7.1.13.c	The owner or operator of affected HMIWIs shall submit the information specified further in this condition to the Illinois EPA by September 15, 2002 and by September 15 of each year thereafter. After	C	The required report was submitted within 60 days after the end of the reporting period and included the

	<p>issuance of the CAAPP permit, the Permittee shall submit these reports semi-annually. The annual report shall include the following information:</p> <p>a) The values for site-specific operating parameters established pursuant to 35 IAC 229.142; b) The highest maximum operating parameter and the lowest minimum operating parameter, as applicable, for each operating parameter, recorded for the calendar year being reported and for the calendar year preceding the year being reported; c) Any information recorded pursuant to 35 IAC 229.182(a) (3) through (5) for the calendar year being reported and for the calendar year preceding the year being reported; d) If no exceedences or malfunctions were recorded under 35 IAC 229.182(a) (3) through (a) (5) for the calendar year being reported, a statement that no exceedences occurred during the reporting period; and e) Any use of the bypass stack, the duration of use, the reason for malfunction, and the corrective actions taken.</p>		specified information.
7.1.13.d	<p>The semiannual reports must be submitted within 60 days following the end of the reporting period. The first semiannual reporting period ends on March 15 of each year and the second semiannual reporting period ends on September 15 of each year.</p>	C	The report was submitted prior to November 15, 2002
7.1.14	<p>Operational Flexibility/Anticipated Operating Scenarios</p>	C	There are no terms to this condition.
7.1.15.a	<p>Compliance with emission limits established in this permit for affected HMIWI is assumed to be achieved by compliance with operating, control, and testing requirements and procedures established pursuant to 35 IAC Part 229. Specific emission factors for the regulated air pollutants shall be established</p>	C	The HMIWI initial stacking tests determined emission factors.

	based on the data of initial stack testing performed		
7.1.15.b	The uncontrolled emission factors for emissions shall be used prior to new controlled emission data being retrieved from the stack testing. For these purposes, the following AP-42 emission factors shall be used	C	Prior to the stack testing the emissions factors used were from AP-42.
7.2.1	Natural gas-fired boilers used to produce heat and steam at the source.	C	Natural gas fired boilers produce heat and steam at the source.
7.2.2	List of Emission Units and Pollution Control Equipment	C	The installed natural gas boilers are as described in the permit.
7.2.3	Applicability Provisions and Applicable Regulations a)An "affected boiler" for the purpose of these unit specific conditions is a natural gas-fired boiler used for processing heat and steam for hospital needs. B)For two boilers with a firing rate 23.7 mmBtu/hr each, no person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected 50 percent excess air [35 IAC 216.121].	C	The boilers were operated as specified in this condition.
7.2.4	Non-Applicability of Regulations of Concern a)Each affected boiler is not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides From Existing Fuel Combustion Emission Sources in Major Metropolitan Areas, because the actual heat input of each boiler is less than 73.2 MW (250 mmBtu/hr). b)Pursuant to 35 IAC 218.303, any fuel combustion emission unit is not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.	C	The boiler size is below the stated minimum so the source is in compliance
7.2.5	Operational and Production Limits and Work Practices	C	There are no limits.

7.2.6	Emission Limitations	C	There are no limits
7.2.7	Testing Requirements	C	There are no testing requirements
7.2.8	Monitoring Requirements	C	There are no monitoring requirements.
7.2.9	The Permittee shall maintain records of the following items for the affected utility units to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7) (b) of the Act: a) Total natural gas consumption (mmscf/month and mmscf/yr) for all affected boilers. b) Annual emissions of regulated air pollutants as calculated in accordance with compliance procedures in Condition 7.2.12.	C	The source maintains the records of gas consumption and annual emissions are calculated in accordance with Condition 7.2.12.
7.2.10	The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limitations as follows pursuant to Section 39.5(7)(f)(ii) of the Act: If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.	C	The permitted has not had a noncompliance issue for this emission unit.
7.1.11	Operational Flexibility/Anticipated Operating Scenarios	C	There are no requirements for this section.
7.1.12	Compliance with the emission limits established in Condition 5.5.1 of this permit shall be based on the recordkeeping requirements of Condition 7.2.9 and the emission factors and	C	Calculations of emissions are completed using the specified tables.

	<p>formulas listed below: These are the emission factors for uncontrolled natural gas combustion in small boilers (&lt; 100 MMBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, March 1998. Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.</p>		
8.1	<p>Permit Shield Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.</p> <p>This permit shield does not extend to applicable requirements which are promulgated after May 25, 2000 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.</p>	C	The Permittee qualifies under this permit shield condition.
8.2	<p>Applicability of Title IV Requirements (Acid Deposition Control) This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.</p>	C	This source is not a Title IV affected source.
8.3	<p>As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.</p>	C	There are no marketable permit or emission trading programs approved by the USEPA.
8.4.1	<p>Physical or operational changes specifically addressed by the</p>	C	There have been no changes to the



	Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.		conditions of this permit.
8.4.2	<p>The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:</p> <p>a) Describe the physical or operational change; b) Identify the schedule for implementing the physical or operational change; c) Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply; d) Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and e) Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.</p>	C	There have been no changes.
8.5	Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, pursuant to the	C	Tests conducted were documented and reported as required.

	recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.		
8.6.1	A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]: All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.	C	A report for each monitoring period was prepared and submitted and certified.
8.6.2	Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum: a) The name and identification of the affected unit(s); b) The person(s) who will be performing sampling and analysis and their experience with similar tests; c) The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined; d) The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations; e) The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods; f) Any minor changes in standard methodology	C	A written test plan was prepared and submitted more than 60 days prior to the testing. The plan included the required elements.

	<p>proposed to accommodate the specific circumstances of testing, with justification; g) and</p> <p>Any proposed use of an alternative test method, with detailed justification.</p>		
8.6.3	<p>Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7) (e) (i) of the Act]:</p> <p>a)The name and identification of the affected unit(s); b)The date and time of the sampling or measurements; c)The date any analyses were performed; d)The name of the company that performed the tests and/or analyses; e)The test and analytical methodologies used; f)The results of the tests including raw data, and/or analyses including sample calculations; g)The operating conditions at the time of the sampling or measurements; and h)The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.</p>	C	The reports provided to the IEPA included all required information including the operating condition data.
8.6.4.a	<p>The following addresses should be utilized for the submittal of reports, notifications, and renewals: a)Illinois EPA - Air Compliance Section b)Illinois EPA - Air Regional Field Office c)Illinois EPA - Air Permit Section d)USEPA Region 5 - Air Branch</p>	C	Reports were sent to the listed addresses.
8.6.4.b	<p>Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.</p>	C	Reports were sent to the two listed offices.
8.7	Obligation to Comply with Title I Requirements	C	The Permittee complies with Title I

	Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.		requirements.
9.1.1	The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].	C	The Permittee complies with known state and Federal regulations.
9.1.2	In particular, this permit does not alter or affect the following: a)The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section; b)The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; c)The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and d)The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.	C	The Permittee complies with these requirements.
9.1.3	Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other	C	No other credible evidence has been used to establish compliance or noncompliance

	credible evidence to establish compliance or noncompliance with applicable requirements.		beyond the permit requirements.
9.2.1	The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act]. The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.	N	The Permittee has not complied with all terms and conditions and therefore can not be in compliance with this section.
9.2.2	The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.	C	The Permittee has performed maintenance as soon as possible after a problem was identified. In no case was the required maintenance an issue regarding emissions.
9.2.3	No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].	C	The system was repaired prior to resuming operation after identifying the malfunction or breakdown.
9.2.4	The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or	C	The source disposes of waste collected by operation in

	activities shall not cause a violation of the Act or regulations promulgated thereunder.		accordance with regulations.
9.2.5	The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.	C	The Permittee has paid fees consistent with the fee schedule.
9.3	Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized of the Act]: a) Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit; b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit; c) Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; d) Sample or monitor any substances or parameters at any location: 1. At reasonable times, for the purposes of assuring permit compliance; or 2. As otherwise authorized by the CAA, or the Act. e) Obtain and remove samples of any discharge or emission of pollutants; and f) Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving,	C	The IEPA or their representatives have been allowed all access to the site, information, and materials.

	testing, monitoring, or recording any activity, discharge or emission at the source.		
9.4	The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.	C	The Permittee complies with all known applicable laws, regulations, and ordinances.
9.5.1	This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.	C	There are no title disputes as a result of this permit.
9.5.2	This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.	C	The Permittee does not seek release from any liability as a result of this permit.
9.5.3	This permit does not take into consideration or attest to the structural stability of any unit or part of the source.	C	This permit is not relied upon for determination of structural stability.
9.5.4	This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source	C	The Permittee does not rely on this permit to include the IEPA in any liability from the source.
9.5.5	This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].	C	The Permittee does not rely upon this permit to convey any property rights.
9.6.1	A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.	C	Maintenance records are kept as required.
9.6.2	A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise	C	A record of kept of any changes that result in emissions of a regulated air pollutant.

	regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].		
9.6.3.a	Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].	C	Records are maintained for at least five years.
9.6.3.b	Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.	C	Other records required are retained for at least five years.
9.7	The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.	C	The Permittee submitted an annual emissions report by May 1.
9.8	Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit. a) The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the	C	Annual compliance certifications were submitted as specified in subsections a, b, and c.



	method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit. b)All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA. C)All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.		
9.9	Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.	C	All documents submitted contained a certification by a responsible official.
9.10.1	It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].	C	The Permittee has not used the defense in an enforcement action that if would have been necessary to halt or reduce an activity.
9.10.2.a	An emergency shall be an affirmative defense to an action brought for noncompliance with the technology- based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other evidence: a)An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency; b)The permitted source was at the time being properly operated; c)The Permittee	C	No emergencies were declared.

	submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and d) During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.		
9.10.2.b	This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.	C	No emergencies were declared.
9.11	This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.	C	No equipment was physically removed from the indicated locations.
9.12.1	This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section	C	Requested changes to the permit were in accordance with this section.

	39.5(7)(o)(iii) of the Act].		
9.12.2	<p>This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:</p> <p>a) Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit; b) Additional requirements become applicable to an affected source for acid deposition under the acid rain program; c) The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and d) The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.</p>	C	None of the listed conditions occurred.
9.12.3	<p>The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.</p>	C	The Permittee has not knowingly submitted misinformation, false statements, or misrepresented the source equipment.
9.12.4	<p>The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along</p>	C	The Permittee responded in a timely fashion to all IEPA requests.

	with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].		
9.13	The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].	C	No severability issues has arisen.
9.14	The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].	C	The permit has not expired.

Good Samaritan Regional Health Center  
Table 2.

081030ACN

Permit Condition Reference	Description of Permit Condition	Deviation Period Start Date	Deviation Period End Date	Description and Cause of Deviation	Corrective Actions Taken to Remedy Deviation	Measure(s) Taken to Prevent Future Deviations
1 4	General Source Description	Permit Issuance	Continuing	The permit describes the incinerator as a batch unit in some conditions and as a continuous unit in other conditions	The permit requires an administrative amendment	An administrative amendment needs to be filed.
4 0	Significant Emission Units at this Source	February 15, 2002	Continuing	The described HMIWI has an air pollution control system installed.	The permit needs to be reissued after acceptance of the test results to show an installed APCS	The deviation is required by other sections of the permit.
5 7 1	The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.	August 2002	The deviation will end with the filing of this revised report	The original report was filed on time. The report did not state there was a noncompliance issue for dioxins because the initial compliance test report showed dioxin compliance	The initial dioxin test was repeated and the system showed compliance. The annual compliance certification report was revised to reflect the dioxin compliance issue and resolution.	The company performing the compliance test will properly label table headings.
7 1 12 a ii M	Use of Bypass	1/10/2003	10/31/2003	Bypass stack open. Most openings lasted less than	Stack cap openings were a continuing problem with no	The variable frequency drive was replaced.

				one or two minutes. See the table at the end of Table 2 for a listing of all recorded instances.	apparent cause although numerous fixes were tried.	Examination of the replaced VFD by the manufacturer determined there was a component failure in the drive. After replacement of the drive, random stack cap openings ceased to be a problem.
7 1.2	List of Emission Units and Air Pollution Control Equipment "Batch HMIWI with maximum waste charging rate 310 lb/hr	Date of permit issuance	Continuing	The permit lists the installed HMIWI as a batch unit.	The permit requires an administrative amendment. The amendment has not been filed.	Correction of the permit will prevent the issue from recurring.
7.1.3.b	The affected medium HMIWI is subject to the emission limits established in 35 IAC Part 229 "Hospital/Medical/Infectious Waste Incinerators" and shall fully comply with 35 IAC Part 229 by September 15, 2002 pursuant to 35 IAC 229.115(b), and Compliance Schedule established in Condition 7.1.10. The Permittee shall be in full	September 15, 2002	November 2003	The system did not show compliance for dioxin emissions	The system was retested for dioxins	The HMIWI is now in compliance for dioxin emissions.

	compliance with all of the HMIWI operator provisions of 35 IAC Part 229, Subpart J by September 15, 2000. All emission limits and requirements are discussed further in this Section					
7.1.8.a	In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected large HMIWI is subject to the following: After September 15, 2002 the emission shall not exceed the following limits pursuant to 35 IAC 229.125(b),	1) Issuance of the permit 2) September 15, 2002	1) Continuing 2) November 2003	There are two noncompliance issues with this condition. 1) The installed unit is a medium unit rather than a large unit. 2) The system did not show compliance for dioxins by September 15, 2002	1) To remedy this noncompliance will require an administrative amendment. 2) The HMIWI conducted a dioxin test on October 30 through November 03 of 2003. The results demonstrated compliance	The system has now shown dioxin compliance.
7.1.9.a	Initial performance testing of the affected large HMIWI shall be performed no later than the date established in the Compliance Schedule of Condition 7.1.10 and by using the following USEPA test Methods, as established by 35 IAC 229.104 (d): USEPA Methods: 1, 2, 3, 3a, 5, 9, 10, 10B, 23,	June 1, 2002	August 7-9, 2002	Because of equipment problems the initial compliance test could not be conducted prior to June 1 <sup>st</sup> .	The initial compliance test was conducted as soon as possible after the equipment problems were resolved.	This was a failure to meet a schedule. Because the milestone has been completed there is no concern of a repeat noncompliance issue.

	26, 26A, and 29.					
7 1.10 c	Compliance Plan/Schedule of Compliance To meet full compliance with 35 IAC Part 229 by September 15, 2002 the Permittee shall fulfill the following actions: Complete the initial performance test by June 1, 2002.	June 1, 2002	August 7-9, 2002	Because of equipment problems the initial compliance test could not be conducted prior to June 1 <sup>st</sup> .	The initial compliance test was conducted as soon as possible after the equipment problems were resolved.	This was a failure to meet a schedule. Because the milestone has been completed there is no concern of a repeat noncompliance issue.
9.2.1	The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act]. The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an	Issuance of the permit	Continuing	Several conditions are not in compliance	The Permittee is working to be in compliance with all conditions.	Once all conditions are in compliance the Permittee will act to maintain compliance.



	alternate schedule for compliance with the applicable requirement is established.					
7.1.12.a	Temperature excursions	2/27/2003	10/23/2003 See table below	There were problems with temperature control into the quench tank	A pump was installed to boost the water pressure. While this solved the main problem, pump failures have continued to be a problem.	The facility is investigating sources for more reliable pumps.

#### Stack Cap Open/close Record

Date            Opened    Closed

1/10/2003	5.38	6.27
1/10/2003	6.36	7.10
1/15/2003	5.14	5:17
1/15/2003	5.28	5:35
1/16/2003	15.08	15:11
1/16/2003	16.11	16.14
2/4/2003	9.07	9:09
2/4/2003	9.10	9:10
3/3/2003	9.11	9:18
3/3/2003	9.18	9:19
3/24/2003	10.00	10:02
3/24/2003	10.02	10.04
3/24/2003	10.04	10.05
3/24/2003	10.06	10:06
3/24/2003	10.17	10:18
5/5/2003	10.42	11.14

Date            Type

2/27/2003	Inlet Temperature Violation
3/10/2003	Inlet Temperature Violation
3/31/2003	Inlet Temperature Violation
4/14/2003	Inlet Temperature Violation
4/15/2003	Inlet Temperature Violation
4/17/2003	Inlet Temperature Violation
4/21/2003	Inlet Temperature Violation
8/4/2003	Secondary Temperature Violation
8/5/2003	Secondary Temperature Violation
8/18/2003	Secondary Temperature Violation
10/23/2003	Secondary Temperature Violation

5/5/2003	13.16	13:57
5/8/2003	8:55	9:46
5/27/2003	7:38	7:41
5/27/2003	7:52	7:59
6/6/2003	8 24	8 31
6/13/2003	9.40	9:43
7/16/2003	9:09	9:13
7/16/2003	10:33	10:37
7/16/2003	10:37	10:37
7/16/2003	10.37	10:39
7/16/2003	11.08	11:10
7/16/2003	11:26	11:27
7/22/2003	9:13	9:17
7/28/2003	7 49	8:32
7/28/2003	10 02	10:02
8/5/2003	4.43	4:54
8/18/2003	5:55	6:02
8/18/2003	8:53	13:02
9/11/2003	9:41	9:49
10/23/2003	8:11	8.56
10/31/2003	9 42	9:43

## **2004 Waste Management Plan Update**

### **Good Samaritan Regional Health Center, Mt. Vernon, IL**

1. Description of Progress toward Plan Goals.
  - a. Reduction
    1. Purchasing continues their effort to obtain products with reduced packing.
    2. The hospital is purchasing longer life light bulbs. This reduces not only packaging but also waste light bulbs.
    3. The hospital has switched to mercury free lights and is working to eliminate mercury temperature gauges.
  - b. Recycling
    1. Total waste recycled in 2003 increased to 77 tons compared to 64 tons recycled in 2002 and 43 tons recycled in 2001.
    2. A cell phone recycling program was implemented in conjunction with Mt. Vernon/Jefferson County Bright & Beautiful. This program collects old and broken phones. These are recycled.
  - c. Education
    1. Employees are trained in what to look for in the separating the waste stream.
    2. The classifications of biohazard, recyclable, what can be incinerated, and what must be land filled are explained.
  - d. Recycle Contractors
    1. NiCad and Lead Acid batteries are delivered to Battery Specialist.
    2. Alkaline batteries are picked up by Retrofit Recycling.
    3. Cell phones are taken by Mt. Vernon/Jefferson County Beautiful, Inc.
    4. Office paper, Newspaper, magazines, junk mail, and purged records are picked up by Ripped to Shreds.
    5. Phonebooks and Cardboard are handled by Kendrick Paper Stock.
    6. All lighting and mercury containing materials are handled by Retrofit Recycling.
    7. Lab chemicals are handled by Safety Klean.
    8. A local Scout Troop picks up the aluminum cans.
    9. Biohazard material is either incinerated or is picked up by Stericycle Inc of St. Louis or McKay's Hazmat.

2. Summary of Waste Management practices implemented.
3. Plan Amendments
  - a. There were no required amendments to the plan.